

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

BIENVENIDO ALEJANDRO BUSTAMANTE
HUNGRIA
dba ALEJANDRO BUSTAMANTE HUNGRIA
aka ALEJANDR BUSTAMANTE HUNGRIA
aka BIENVENIDO A BUSTAMANTE HUNGRIA
aka BIENVENIDOBUSTAMANTE
SSN: xxx-xx-2563
2 CALLE HORTENSIA
APT 15H
SAN JUAN, PR 00926
Debtor,

CASE NO. 23-00323/ESL

CHAPTER 13

11 USC 362 d(1) d(2)

Relief from stay for cause

**DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY
NOTICE, DOCKET NO. 27**

TO THE HONORABLE COURT:

NOW COMES, BIENVENIDO ALEJANDRO BUSTAMANTE HUNGRIA,
the debtor through the undersigned attorney, and very respectfully states and prays as
follow:

1. On May 16, 2023, Nationstar Mortgage LLC filed a *Motion for Relief from Automatic Stay Notice*, Docket No. 27, alleging that the Debtor is in arrears in the direct post-petition mortgage payments with said creditor, in the sum of \$1,039.56.

2. The Debtor respectfully submits that on May 19, 2023, he made one (1) payment in the sum of \$1,040.00 (confirmation no. 101084822) to Nationstar in order to cure any and all post-petition arrears owed to said secured creditor.

3. Based on the above stated, the Debtor respectfully submits that he is currently up-to-date with the direct post-petition payments to Nationstar and requests that the Court deny Nationstar's motion for relief from stay, Docket No. 27.

WHEREFORE, the Debtor respectfully requests from this Honorable Court to deny the motion for relief from automatic stay filed by Nationstar, Docket No. 27.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of the same to: the Chapter 13 Trustee Alejandro Oliveras Rivera, Esq.; Robertson, Anschutz, Schneid & Crane, PLLC, Francisco J. Cardona Esquire, Esq, Attorney for Secured Creditor; I also certify that a copy of this motion has been sent via US Postal Service to the Debtor to his address of record.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 24th day of May, 2023.

/s/Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
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